

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Unlicensed Operation in the TV Broadcast)	ET Docket No. 04-186
Bands)	
)	

On January 4, 2010, nine companies submitted proposals seeking to be designated a TV bands Database Administrator (“DBA”). All nine applicants propose to offer complete, end-to-end systems that:

- Communicate with the FCC and stakeholders to collect incumbent records
- Allow registration of TV band devices and protected entities not in the FCC’s database
- Calculate and provide TV band available channel lists on a non-discriminatory basis
- Synchronize with other TV band database administrator systems

However, some applicants and other interested parties propose the imposition of a single, exclusive “clearinghouse”. As proposed, a clearinghouse would stand between the Commission and all other DBAs. It would control the distribution of FCC-originated data, the registration of TV band devices, the management of protected incumbent records, the development of software algorithms, and the calculation of channel lists.

Granting such authority to a single entity could create a de-facto monopoly. Monopoly power no matter where it resides in the administration of white spaces would defeat the principal purpose of authorizing multiple administrators and be contrary to public interest for various reasons. It would significantly stifle feature development, innovation and investments in the technologies necessary for successful unlicensed TV bands adoption. It is also unnecessary. The Commission already provides clearinghouse functionality for incumbent TV band records through its CDBS and ULS databases.

Authorizing multiple DBAs to provide direct service to the public will promote diversity and innovation in design, software features, and services.

Lastly, inter-administrator synchronization is sufficient for distributing incumbent records not in the FCC's databases. It is supported in all nine proposals

The Commission should not create a monopoly under the guise of a clearinghouse. The Commission's present strategy of competition among administrators will best serve the public.

Sincerely (signed alphabetically, by company)

/s/

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/s/

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/s/

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